

REMARKS

Favorable reconsideration of this application, in light of the following discussion, is respectfully requested.

Claims 1-29, 34, and 35 are currently pending. No claims have been amended herewith.

In the outstanding Office Action, Claims 1, 2, 4, 6, 11, 12, 14, 17, 19, 20, 24, 26, 27, 34, and 35 were rejected under 35 U.S.C. § 103(a) as being unpatentable over JP Patent Application Publication No. 2001-270194 to Kobayashi (hereinafter “the ‘194 application”) in view of U.S. Patent No. 7,164,486 to Nakamura et al. (hereinafter “the ‘486 patent”) and U.S. Patent Application Publication No. 2002/0156704 to Kolls (hereinafter “the ‘704 application”); Claims 3, 5, 7, 16, 18, and 25 were rejected under 35 U.S.C. § 103(a) as being unpatentable over the ‘194 application in view of the ‘486 patent, the ‘704 application, and JP Patent Application Publication No. 2001-217972 to Kajita (hereinafter “the ‘972 application”); Claims 9, 22, and 29 were rejected under 35 U.S.C. § 103(a) as being unpatentable over the ‘194 application in view of the ‘486 patent, the ‘704 application, and U.S. Patent No. 5,892,595 to Yamakawa et al. (hereinafter “the ‘595 patent”); Claims 8, 15, 21, and 28 were rejected under 35 U.S.C. § 103(a) as being unpatentable over the ‘194 application in view of the ‘486 patent, the ‘704 application, and U.S. Patent Application Publication No. 2002/0036643 to Namizuka et al. (hereinafter “the ‘643 application”); Claims 10 and 23 were rejected under 35 U.S.C. § 103(a) as being unpatentable over the ‘194 application in view of the ‘486 patent, the ‘704 application, the ‘643 application, and U.S. Patent Application Publication No. 2001/0019429 to Oteki et al. (hereinafter “the ‘429 application”); and Claim 13 was rejected under 35 U.S.C. § 103(a) as being unpatentable over the ‘194 application in view of the ‘486 patent, the ‘704 application, and U.S. Patent

Application Publication No. 2001/0015821 to Namizuka et al. (hereinafter “the ‘821 application”).

REJECTION UNDER 35 U.S.C. § 103

Claim 1 is directed to an image forming apparatus, comprising:

an image reading device configured to read an image of an original document;

an image forming device configured to form an image on a sheet in accordance with image data read by the image reading device;

an operation unit connecting device configured to detachably connect an operation unit, said operation unit being configured to accept inputting of operational instructions for operating the image forming apparatus and to connect to the image forming apparatus via the operation unit connecting device;

a process controller configured to control an operation of at least one of the image reading device and the image forming apparatus; and

*an expansion unit connecting device configured to connect an additionally attachable expansion unit, said additionally attachable expansion unit including an expansion control device and being configured to further connect to the operation unit detached from the image forming apparatus, wherein*

said additionally attachable expansion unit connects to the image forming apparatus via the expansion unit connecting device, and

*said process controller is configured to control the operation unit to operate, to receive a control command from the operation unit when the operation unit is attached to the image forming apparatus, and to receive the control command from the additionally attachable expansion unit when the additionally attachable expansion unit is attached to the image forming apparatus and the operation unit is attached to the additionally attachable expansion unit, the operation unit being detached from the image forming apparatus and attached to the additionally attachable expansion unit when the additionally attachable expansion unit controls the operation of the at least*

*one of the image reading device and the image forming apparatus.*

Regarding the rejection of Claim 1 under 35 U.S.C § 103(a), the Office Action apparently acknowledges, and it is respectfully submitted, that the '194 application and '486 patent, alone or in proper combination, fail to disclose "the operation unit being detached from the image forming apparatus,"<sup>1</sup> or "an interface that is able to be detached from a printer and placed on another device that is able to externally control the printing device."<sup>2</sup> Rather, the Office Action cites paragraphs [0076] to [0086], and Figures 1C-1E, of the '704 application for such a teaching.<sup>3</sup>

Thus, it is respectfully submitted that the '194 application and the '486 patent, alone or in proper combination, fail to disclose an expansion unit connecting device configured to connect an additionally attachable expansion unit, said additionally attachable expansion unit including an expansion control device and being configured to further connect to the operation unit detached from the image forming apparatus, and a process controller that is configured to control the operation unit to operate, to receive a control command from the operation unit when the operation unit is attached to the image forming apparatus, and to receive the control command from the additionally attachable expansion unit when the additionally attachable expansion unit is attached to the image forming apparatus and the operation unit is attached to the additionally attachable expansion unit, the operation unit being detached from the image forming apparatus and attached to the additionally attachable expansion unit when the additionally attachable expansion unit controls the operation of the at least one of the image reading device and the image forming apparatus.

Further, it is respectfully submitted that the '704 application fails to remedy the deficiencies of the '194 application and the '486 patent, as discussed above. The '704

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<sup>1</sup> See Office Action dated May 13, 2009, page 9.

<sup>2</sup> Id. at page 3.

<sup>3</sup> Id. at page 10.

application is directed to a method of constructing a digital content play list for transmission and presentation on a public access electronic terminal. In particular, the '704 application discusses a system 500 that includes an equipment control means 506 that enables and disables vending equipment, such as a printer, for use responsive to customer identification "authorization" by way of a smart card, debit card, credit card, or other input identification means.<sup>4</sup>

The Office Action apparently cites the '704 system 500c connected to a print station 646 and the system 500 connected to a PC 630 for teaching "a user interface detached from a printing device and attached to an additionally attachable expansion unit that is connected to the printing device."<sup>5</sup> In particular, the Office Action asserts that

the system (500c) can be attached directly to a printer to control the device. Also, **this same device can be connected to a CPU tower (630)** that controls a computer and an attached printer. The system (500) can be used to control the computer to control the printer device. Since **the same system can be used to control a printer and an additionally attachable expansion unit**, considered as the computer connected to a printer (114), the Kolls reference combined with the references of Kobayashi and Nakamura can perform the feature of having a user interface detached from a printing device and attached to an additionally attachable expansion unit that is connected to the printing device.<sup>6</sup>

However, it is noted that the '704 application simply discuss that the print station 646 is interconnected with a system 500C, which can be a system 500, and that a system 500 can be integrated into the PC 630.<sup>7</sup> Further, the '704 application discusses that a plurality of systems 500 can be connected to a plurality of vending machines,<sup>8</sup> and that **the system 500 is manufactured to include or exclude a specific combination of control means** to produce a desired control result at a desirable cost to a customer, **based on customer specifications** and

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<sup>4</sup> See '704 application, paragraph [0110].

<sup>5</sup> See Office Action dated May 13, 2009, page 10.

<sup>6</sup> Id.

<sup>7</sup> See '704 application, paragraphs [0084] and [0085].

<sup>8</sup> Id. at paragraph [0144].

cost considerations.<sup>9</sup> The '704 application does not disclose, explicitly or inherently, that the **same** system 500 can be connected to each of the printer 646 (i.e., the asserted image forming apparatus) and the PC 630 (i.e., the asserted additionally attachable expansion unit). That is, the '704 application does not disclose that *the PC 630 is configured to further connect to the system 500C detached from the print station 646*. Further, as noted in MPEP § 2112, inherency may not be established by probabilities or possibilities, "the mere fact that a certain thing may result from a given set of circumstances is not sufficient."

Thus, no matter how the teachings of the '194 application, the '486 patent, and the '704 application are combined, the combination does not teach or suggest the expansion unit connecting device and the process controller defined in Claim 1. Accordingly, Applicant respectfully traverses the rejection of Claim 1 (and all associated dependent claims) as being unpatentable over the '194 application, the '486 patent, and the '704 application.

Claim 11 recites limitations analogous to the limitations recited in Claim 1. Accordingly, for reasons analogous to the reasons stated above for the patentability of Claim 1, Applicant respectfully traverses the rejection of Claim 11 (and all associated dependent claims) as being unpatentable over the '194 application, the '486 patent, and the '704 application.

Claims 17 and 24 recite, in part,

detecting a presence of connection of the additionally attachable expansion unit that is configured to connect to the operation unit detached from the image forming apparatus, the additionally attachable expansion unit being connected to the image forming apparatus via the expansion unit connecting device; and

receiving, by the process controller, a control command from the operation unit when the operation unit is attached to the image forming apparatus, and from the additionally attachable expansion unit when the additionally attachable expansion unit is attached to the image forming apparatus and

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<sup>9</sup> Id. at paragraph [0107].

the operation unit is attached to the additionally attachable expansion unit, the operation unit being detached from the image forming apparatus and attached to the additionally attachable expansion unit when the additionally attachable expansion unit controls the operation of the at least one of the image reading device and the image forming apparatus.

As noted above, the '194 application, the '486 patent, and the '704 application, alone or in proper combination, fail to disclose the expansion unit connecting device and the process controller recited in Claim 1. Thus, the '194 application, the '486 patent, and the '704 application fail to disclose the methods of independent Claims 17 and 24, respectively. Accordingly, it is respectfully submitted that Claims 17 and 24 (and all associated dependent claims) patentably define over any proper combination of the '194 application, the '486 patent, and the '704 application.

Regarding the rejections of dependent Claims 3, 5, 7, 16, 18, and 25 under 35 U.S.C. § 103(a), it is respectfully submitted that the '972 application fails to remedy the deficiencies of the '194 application, the '486 patent, and the '704 application, as discussed above. Accordingly, it is respectfully submitted that dependent Claims 3, 5, 7, 16, 18, and 25 patentably define over any proper combination of the '194 application, the '486 patent, the '704 application, and the '972 application.

Regarding the rejections of dependent Claims 9, 22, and 29 under 35 U.S.C. § 103(a), it is respectfully submitted that the '595 patent fails to remedy the deficiencies of the '194 application, the '486 patent, and the '704 application, as discussed above. Accordingly, it is respectfully submitted that dependent Claims 9, 22, and 29 patentably define over any proper combination of the '194 application, the '486 patent, the '704 application, and the '595 patent.

Regarding the rejections of dependent Claims 8, 15, 21, and 28 under 35 U.S.C. § 103(a), it is respectfully submitted that the '643 application fails to remedy the deficiencies of the '194 application, the '486 patent, and the '704 application, as discussed above.

Accordingly, it is respectfully submitted that dependent Claims 18, 15, 21, and 28 patentably define over any proper combination of the '194 application, the '486 patent, the '704 application, and the '643 application.

Regarding the rejections of dependent Claims 10 and 23 under 35 U.S.C. § 103(a), it is respectfully submitted that the '429 application fails to remedy the deficiencies of the '194 application, the '486 patent, the '704 application, and the '643 application, as discussed above. Accordingly, it is respectfully submitted that dependent Claims 10 and 23 patentably define over any proper combination of the '194 application, the '486 patent, the '704 application, the '643 application, and the '429 application.

Regarding the rejection of dependent Claim 13 under 35 U.S.C. § 103(a), it is respectfully submitted that the '821 application fails to remedy the deficiencies of the '194 application, the '486 patent, and the '704 application, as discussed above. Accordingly, it is respectfully submitted that dependent Claim 13 patentably defines over any proper combination of the '194 application, the '486 patent, the '704 application, and the '821 application.

### CONCLUSION

Thus, it is respectfully submitted that independent Claims 1, 11, 17, and 24 (and all associated dependent claims) patentably define over any proper combination of the '194 application, the '486 patent, the '704 application, the '972 application, the '595 patent, the '643 application, the '429 application, and the '821 application.

Consequently, in light of the above discussion, the outstanding grounds for rejection are believed to have been overcome. The application as amended herewith is believed to be in condition for formal allowance. An early and favorable action to that effect is respectfully requested.

Respectfully submitted,

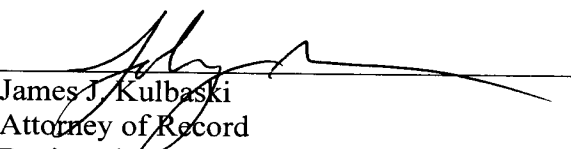
OBLON, SPIVAK, McCLELLAND,  
MAIER & NEUSTADT, P.C.

Customer Number

**22850**

Tel: (703) 413-3000  
Fax: (703) 413 -2220  
(OSMMN 08/07)

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James J. Kulbaski  
Attorney of Record  
Registration No. 34,648

Johnny Ma  
Registration No. 59,976